

EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

EDMOND GRANT P/K/A “EDDY GRANT”, GREENHEART MUSIC LIMITED, a United Kingdom Limited Company, and GREENHEART MUSIC LIMITED, an Antigua and Barbuda Limited Company,

Plaintiffs,

- against -

DONALD J. TRUMP and DONALD J. TRUMP FOR PRESIDENT, INC.,

Defendants.

Civil Action No. 1:20-cv-07103-JGK

**RESPONSES AND OBECTIONS TO
DEFENDANTS’ THIRD SET OF
DOCUMENT REQUESTS TO
PLAINTIFFS [NOS. 41-45]**

Pursuant to Federal Rules of Civil Procedure (“FRCP”) 26 and 34, and the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York (“Local Rules”), plaintiffs Edmond Grant p/k/a “Eddy Grant” (“Grant”), Greenheart Music Limited, a United Kingdom Limited Company (“Greenheart UK”), and Greenheart Music Limited, an Antigua and Barbuda Limited Company (“Greenheart Antigua” and together with Grant and Greenheart UK, “Plaintiffs”), by their undersigned counsel, hereby respond and object (the “Responses”) to defendants’ Donald J. Trump (“Trump”) and Donald J. Trump for President, Inc. (“Trump for President,” and together with Trump, “Defendants”) Third Set of Document Requests to Plaintiffs (the “Requests”), as follows:

RESPONSES AND OBJECTIONS TO INSTRUCTIONS AND DEFINITIONS

Plaintiffs hereby incorporate the responses and objections to Defendants’ Instructions and Definitions as set forth in Plaintiffs’ Responses and Objections to Defendants’ First Set of Document Requests to Plaintiffs [Nos. 1-36], served January 18, 2022 and Plaintiffs’ Responses

and Objections to Defendants' Second Set of Document Requests to Plaintiffs [Nos. 37-40], served April 11, 2022.

**RESPONSES AND OBJECTIONS TO
REQUEST FOR PRODUCTION OF DOCUMENTS**

REQUEST NO. 41:

A copy of each copyright registration certificate relied upon by Plaintiffs in this action.

Response: Plaintiffs object to Request No. 41 on the ground that the copyright registration certificates are not presently in Plaintiffs' possession, custody or control. Plaintiffs further object to the Request on the grounds that the documents sought are equally available to Defendants via the United States Copyright Office. Subject to and without waiving all objections, Plaintiffs state that have already produced documents in this action evidencing the existence of copyright registration certificates for the subject copyrights (see GRANT0186-GRANT0189). Subject to and without waiving all objections, Plaintiffs further state that they will request copies of the subject copyright registration certificates from the United States Copyright Office and will produce documents that are received, if any, prior to the close of discovery.

REQUEST NO. 42:

All documents concerning the basis of the claims covered by US Copyright Registration No. PA0000164029.

Response: Plaintiffs object to Request No. 42 to the extent that the phrase "All documents" renders it over broad, unduly burdensome, and disproportionate to the needs of the case. Plaintiffs further object to the Request on the ground that it seeks the disclosure of information that is not relevant to the issues before the Court. Plaintiffs further object on the ground that the phrase "basis of the claims" is vague and ambiguous and, as written the Request does not clearly indicate what information or documents Defendants are seeking. Plaintiffs also object to the Request to the

extent that it seeks the disclosure of information protected from disclosure by the attorney client privilege, the work-product doctrine, or any other applicable privilege, law, or rule. Plaintiffs further object to the Request on the grounds that it calls for a legal conclusion.

REQUEST NO. 43:

Copies of all deposit materials submitted in connection with the prosecution and registration of US Copyright Registration No. PA0000164029.

Response: Plaintiffs object to Request No. 43 on the ground that the deposit materials are not presently in Plaintiffs' possession, custody or control. Plaintiffs further object to the Request on the grounds that the documents sought are equally available to Defendants via the United States Copyright Office. Subject to and without waiving all objections, Plaintiffs will request copies of the deposit materials from the United States Copyright Office and will produce documents that are received, if any, prior to the close of discovery.

REQUEST NO. 44:

All documents concerning the basis of the claims covered by US Copyright Registration No. SR0000344006 including, but not limited to, the basis of the claims identified in the Copyright Office's records reflecting the copyright registration of the Recording annexed as Exhibit B to the Complaint, namely, "Basis of Claim: New Matter: compilation of recordings, remixed sounds, & photography."

Response: Plaintiffs object to Request No. 44 to extent the phrase "All documents" renders it over broad, unduly burdensome, and disproportionate to the needs of the case. Plaintiffs further object to the Request on the ground that it seeks the disclosure of information that is not relevant to the issues before the Court. Plaintiffs further object on the ground that the phrase "basis of the claims" is vague and ambiguous and, as written the Request does not clearly indicate what

information or documents Defendants are seeking. Plaintiffs also object to the Request to the extent that it seeks the disclosure of information protected from disclosure by the attorney client privilege, the work-product doctrine, or any other applicable privilege, law, or rule. Plaintiffs further object to the Request on the grounds that it calls for a legal conclusion.

REQUEST NO. 45:

Copies of all deposit materials submitted in connection with the prosecution and registration of US Copyright Registration No. SR0000344006.

Response: Plaintiffs object to Request No. 45 on the ground that the deposit materials are not presently in Plaintiffs' possession, custody or control. Plaintiffs further object to the Request on the grounds that the documents sought are equally available to Defendants via the United States Copyright Office. Subject to and without waiving all objections, Plaintiffs will request copies of the deposit materials from the United States Copyright Office and will produce documents that are received, if any, prior to the close of discovery.

Dated: December 22, 2022

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